

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC**

In the Matter of:

Request for Review of the)	
Decision of the)	
Universal Service Administrator by)	
)	
Dell Marketing LP)	CC Docket No: 02-6
FCC Registration Number: 9921677)	
)	
Schools and Libraries Universal Service)	
Support Mechanism)	

REQUEST FOR REVIEW

INTRODUCTION

Section 54.719(c) of the Commission's rules provides that any person aggrieved by an action taken by a division of the Universal Service Administrative Company may seek review from the Commission.¹ Dell hereby appeals the current action taken by USAC in the following case.

BACKGROUND

Dell Marketing LP received a Demand Payment Letter from USAC dated July 12, 2006. The Letter is attached as Exhibit A. Dell has searched their records and was able to find where the school had paid the non-discounted portion. On August 8, 2006, Dell

¹ 47 C.F.R. § 54.719(c).

wrote a Letter of Appeal to the Demand Payment Letter and included copies of the invoices where St. Joseph had paid their portion by American Express. A copy of the Appeal Letter is attached as Exhibit B. USAC responded to Dell on August 14, 2006, by informing them that the issues Dell raised on appeal were not appealable issues. A copy of the Administrator's Acknowledgement Letter of Unappealable Issues is attached as Exhibit C.

DISCUSSION

USAC provides the following appeal guidelines on its website²:

Appeals Guidelines - Schools and Libraries

The Schools and Libraries Program of USAC reviews appeals of its decisions in accordance with guidelines established by the Schools and Libraries Programmatic Subcommittee of the USAC board of directors. There are four circumstances when appeals can be granted by USAC, assuming there are no other issues identified during review:

1. When the appeal makes clear that USAC erred in its initial review.
2. When the appeal makes clear that the applicant made a mistake in information provided in or with the application leading to funding denial and that USAC could have identified the mistake from information provided with the application.
3. When the appeal provides documentation to correct an incorrect USAC assumption made because there was insufficient information in the application file about an issue.
4. When USAC obtains policy clarification or new policies between the time of funding commitment and the appeal decision.

In the current case, Dell feels that the appeal submitted to USAC on August 8, 2006, clearly falls within the first reason for filing an appeal. USAC, through an investigation, has made the assumption St. Joseph High School did not pay the required non-discounted share. Even though St. Joseph may not have been able to produce the payment records, Dell has been able to locate the paid invoices and is currently trying to provide the information to USAC. In Dell's August 8th Appeal to USAC, Dell attached the proof of payment. Dell stands ready to produce the records in its possession that St.

² See URL address <http://www.universalservice.org/sl/about/appeals/appeals-guidelines.aspx> for the Appeal Guidelines with explanations by USAC.

Joseph did pay its non-discounted share. USAC has been unresponsive to receiving the new payment information and has sent a second demand payment letter to Dell. See Exhibit D for a copy of the second demand payment letter received August 14, 2006.

In the Commission's Fifth Report and Order, USAC was directed to verify payments of the non-discounted share from the beneficiary.³ Dell agrees with this policy and is not asking for a waiver from this policy. Dell is simply trying to provide the requested information the beneficiary was not able to locate. Dell has located the information, but is now not being given the opportunity to present the proof of payment to USAC. The August 14th letter received from USAC does not identify the specific reason the merits of the appeal were not considered. The only assumption Dell can make is that USAC denied the appeal because new information was introduced.

Dell is now facing threat of the red light rule, which could affect millions of dollars and hundreds of innocent applicants. This would seem to go against the stated goals of the E-rate program and not be in the public's best interest. Specifically, section 254 directs the Commission to "enhance . . . access to advanced telecommunications and information services for all public and non-profit elementary and secondary school classrooms, health care providers and libraries."⁴ In the event Dell is placed under the red light rule and is not allowed to present the new payment information, many innocent applicants and millions of dollars in funding will be at risk. If St. Joseph School did not pay their share, then there has been a program violation. But in this case, good reason exists to believe the School has paid their share and no program violation occurred. USAC will not accept the new information simply because their procedural deadlines have passed.

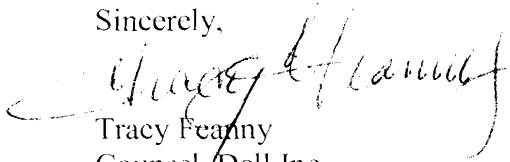
³ See *Schools and Libraries Universal Support Mechanism*, CC Docket No. 02-6, Fifth Report and Order, 19 FCC Rcd 15808, para. 24 (2004) (*Schools and Libraries Fifth Report and Order*).

⁴ See 47 U.S.C. § 254(h).

SUMMARY

Dell requests the Commission to remand this case back to USAC with instructions to process the information provided by Dell and reexamine if the School District did comply with program requirements to pay their non-discounted portion. If you require further information, please contact me at (512) 723-6750 or via e-mail at Tracy_Feanny@dell.com.

Sincerely,



Tracy Feanny
Counsel, Dell Inc.

EXHIBIT A



ATTN: LDRJ
F400K
Universal Service Administrative Company
Schools & Libraries Division

Demand Payment Letter
Funding Year 2000: 7/01/2000 - 6/30/2001

July 12, 2006

Danielle Swanston
ST JOSEPH HIGH SCHOOL
PLOT # 3 MOUNT PLEASANT RT 2 FREDERIKSTED
ST CROIX, VI 00840

Re: Form 471 Application Number: 170343
Funding Year: 2000
Applicant's Form Identifier: Internet
Billed Entity Number: 209820
FCC Registration Number: 13366281
SPIN Name: Dell Marketing LP
Service Provider Contact Person: Craig Jackson

FRN
365324

You were previously sent a Notification of Commitment Adjustment Letter informing you of the need to recover funds for the Funding Request Number(s) (FRNs) listed on the Funding Commitment Adjustment Report (Report) attached to the Notification of Commitment Adjustment Letter. A copy of that Report is attached to this letter. Immediately preceding the Report, you will find a guide that defines each line of the Report.

The balance of this debt is due within 30 days from the date of this letter. Failure to pay the debt within 30 days from the date of this letter could result in interest, late payment fees, administrative charges and implementation of the "Red Light Rule." Please see the "Informational Notice to All Universal Service Fund Contributors, Beneficiaries, and Service Providers" at <http://www.universalservice.org/fund-administration/tools/latest-news.aspx#083104> for more information regarding the consequences of not paying the debt in a timely manner.

If the Schools and Libraries Division (SLD) has determined that both the applicant and the service provider are responsible for a program rule violation, then, pursuant to the Order on Reconsideration and Fourth Report and Order (FCC 04-181), the SLD will seek recovery of the improperly disbursed amount from BOTH parties and will continue to seek recovery until either or both parties have fully paid the debt. If the SLD has determined that both the applicant and the service provider are responsible for a program rule violation, this was indicated in the Funding Commitment Adjustment Explanation on the Funding Commitment Adjustment Report.

If the SLD is attempting to collect all or part of the debt from both the applicant and the service provider, then you should work with your service provider to determine who will be

debt to avoid duplicate payment. Please note, however, that the debt is the responsibility of both the applicant and service provider. Therefore, you are responsible for ensuring that the debt is paid in a timely manner.

Please remit payment for the full "Funds to be Recovered from Applicant" amount shown in the Report. To ensure that your payment is properly credited, please include a copy of the Report with your check. Make your check payable to the Universal Service Administrative Company (USAC).

If sending payment by U. S. Postal Service or major courier service (e.g. Airborne, Federal Express, and UPS) please send check payments to:

Universal Service Administrative Company
1259 Paysphere Circle
Chicago, IL 60674

If you are located in the Chicago area and use a local messenger rather than a major courier service, please address and deliver the package to:

Universal Service Administrative Company
Lockbox 1259
540 West Madison 4th Floor
Chicago, IL 60661

Local messenger service should deliver to the Lockbox Receiving Window at the above address.

Payment is due within 30 days from the date of this letter.

Complete program information is posted to the SLD section of the USAC web site at www.universalservice.org/sld/. You may also contact the SLD Technical Client Service Bureau by e-mail using the "Submit a Question" link on the SLD web site, by fax at 1-888-276-8736 or by phone at 1-888-203-8100.

Universal Service Administrative Company
Schools and Libraries Division

cc: Craig Jackson
Dell Marketing LP

A GUIDE TO THE FUNDING COMMITMENT ADJUSTMENT REPORT

A report for each E-rate funding request from your application for which a commitment adjustment is required is attached to this letter. We are providing the following definitions for the items in that report.

FUNDING REQUEST NUMBER (FRN): A Funding Request Number is assigned by the SLD to each individual request in your Form 471 once an application has been processed. This number is used to report to applicants and service providers the status of individual discount funding requests submitted on a Form 471.

SERVICES ORDERED: The type of service ordered from the service provider, as shown on Form 471.

SPIN (Service Provider Identification Number): A unique number assigned by the Universal Service Administrative Company to service providers seeking payment from the Universal Service Fund for participating in the universal service support mechanisms. A SPIN is also used to verify delivery of services and to arrange for payment.

SERVICE PROVIDER NAME: The legal name of the service provider.

CONTRACT NUMBER: The number of the contract between the applicant and the service provider. This will be present only if a contract number was provided on your Form 471.

BILLING ACCOUNT NUMBER: The account number that your service provider has established with you for billing purposes. This will be present only if a Billing Account Number was provided on your Form 471.

SITE IDENTIFIER: The Entity Number listed in Form 471, Block 5, Item 22a. This number will only be present for "site specific" FRNs.

ORIGINAL FUNDING COMMITMENT: This represents the original amount of funding that SLD had reserved to reimburse you for the approved discounts for this service for this funding year.

COMMITMENT ADJUSTMENT AMOUNT: This represents the amount of funding that SLD has rescinded because of program rule violations.

ADJUSTED FUNDING COMMITMENT: This represents the adjusted total amount of funding that SLD has reserved to reimburse for the approved discounts for this service for this funding year. If this amount exceeds the Funds Disbursed to Date, the SLD will continue to process properly filed invoices up to the new commitment amount.

FUNDS DISBURSED TO DATE: This represents the total funds that have been paid to the identified service provider for this FRN as of the date of this letter.

FUNDS TO BE RECOVERED FROM APPLICANT: This represents the amount of improperly disbursed funds to date as a result of rule violation(s) for which the applicant has been determined to be responsible. These improperly disbursed funds will have to be recovered from the applicant.

FUNDING COMMITMENT ADJUSTMENT EXPLANATION: This entry provides an explanation of the reason the adjustment was made.

**Funding Commitment Adjustment Report
Form 471 Application Number: 170343**

Funding Request Number:	365324
Services Ordered:	INTERNAL CONNECTIONS
SPIN:	143004340
Service Provider Name:	Dell Marketing LP
Contract Number:	471-209820
Billing Account Number:	692-2455
Site Identifier:	209820
Original Funding Commitment:	\$38,387.79
Commitment Adjustment Amount:	\$38,387.79
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$38,386.01
Funds to be Recovered from Applicant:	\$38,386.01

Funding Commitment Adjustment Explanation:

After a thorough investigation, it has been determined that funds were improperly disbursed on this funding request. During the course of an audit it was determined that the applicant did not pay any of the non-discounted portion. FCC rules require applicants to pay the non-discount portion of the products or services purchased with universal service discounts. Applicants that do not pay the non-discount portion more than 90 days after completion of services have violated this rule. Consequently, the program rules have been violated. Accordingly, the SLD is seeking recovery of any disbursed funds.

**PLEASE SEND A COPY OF THIS PAGE WITH YOUR
CHECK TO ENSURE TIMELY PROCESSING**

***** JUL. 26. 2006 9:19AM DELL

NO. 863 P. 5

Craig Jackson
Dell Marketing LP
One Dell Way, RR8 MS 8704
Round Rock, TX 78682

EXHIBIT B



August 08, 2006

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
100 South Jefferson Road
P.O. Box 902
Whippany, New Jersey 07981

Re: Demand Payment Letter – Funding Year 2000: 7/01/2000 – 6/30/2001
Funding Request Number: 365324
Form 471 Application Number: 170343
Funding Year: 2000
Applicant's Form identifier: Internet
FCC Registration Number: 13366281
SPIN Name: Dell Marketing L.P.
Service Provider Contact Person: Craig Jackson

Dell would like to appeal the determination in the attached Funding Adjustment Report for Form 471 Application Number: 170343. In the report USAC claims that funds were improperly disbursed for Funding Request Number 365324 because the applicant (St. Joseph High School) did not pay any of the non-discounted portion of the price for the Dell products and services purchased with universal service discounts. Our records indicate that St. Joseph High School paid the non-discounted portion the product price with an American Express Credit Card on October 13, 2000. The invoice numbers below correlate to Purchase Order # 471209820. I have attached a copy of the invoices for your review.

Invoice	Date	Payment	Amount Paid
395736689	10 13 00	AMERICAN EXPRESS CDC TRANS	1181.50
388903759	10 13 00	AMERICAN EXPRESS CDC TRANS	1112.39
388907370	10 13 00	AMERICAN EXPRESS CDC TRANS	634.61
388957359	10 13 00	AMERICAN EXPRESS CDC TRANS	<u>1108.70</u>
Total Amount Paid			4037.20

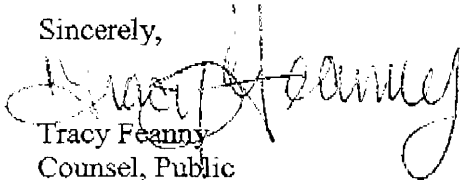
Based on this information, we request that you reopen your investigation to verify that St. Joseph High School paid the non-discounted portion of the Dell products and services outlined in Form 471 Application Number 170343 with an American Express Card. Please let us know whether you need any additional documentation or information to complete your review. We are confident you will determine that the SLD funds were properly disbursed.

In addition, we request that you refrain from imposing any penalties resulting from a failure to pay the debt referred to in the attached July 12, 2006 Demand Payment Letter while you investigate our assertions.

Thank you for taking the time to review this matter. If you have any questions, please contact me at 512-723-6750 (phone), (512) 283-0393 (fax), Tracy_Feanny@dell.com or at the following mailing address:

Tracy Feanny
Legal Department
Dell Inc.
One Dell Way
Round Rock, TX 78682

Sincerely,


Tracy Feanny
Counsel, Public

CC:

Marla Matthew
St. Joseph High School
Plot #3 Mount Pleasant RT 2 Frederiksted
St Croix, VI 00840

David A. Capozzi
Deputy General Counsel
2000 L Street NW Suite 200
Washington D.C. 20036

Enclosures.



ATTN: LORJ

FA00K

**Universal Service Administrative Company
Schools & Libraries Division****Demand Payment Letter****Funding Year 2000: 7/01/2000 - 6/30/2001**

July 12, 2006

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**PLEASE SEND A COPY OF THIS PAGE WITH YOUR
CHECK TO ENSURE TIMELY PROCESSING**

NCNO. 032 P. P. 7

AUG. 9. 2006 4:25PM DELL.

Craig Jackson
Dell Marketing LP
One Dell Way, RR8 MS 8704
Round Rock, TX 78682



This is your INVOICE
- Copy Only -

Page: 1 of 2

FID Number: 74-2616805
Sales Rep: WENDI KOLETAR
For Sales:
Sales Fax:
Customer Service:
Technical Support:
Dell Online: <http://www.dell.com>

Customer Number: 10940620
Purchase Order: 471209820
Order Date: 6/27/2000
20 01 0 01 02 N

Invoice Number **395736689M**

Invoice Date: 7/10/00
Payment Terms: Net Due 30 Days
Shipped Via:
Waybill Number:

SOLD TO:

MCINTOSH MARY
ST JOSEPH HIGH SCHOOL
PLOT #3 MOUNT PLEASANT
ROUTE 2 FREDERIKSTED
ST CROIX, VI 00840-

SHIP TO:

LETANG CLAINA
ST JOSEPH HIGH SCHOOL
PLOT #3 MOUNT PLEASANT
ROUTE 2 FREDERIKSTED
SAINT CROIX, VI 00840-

Ordered	Shipped	Item Number	Description	Unit	Unit Price	Amount
1	1	220-0029	PEDGE4400,900MHZ/256K CACHE,P3 XEON,BASE	EA	10,301.05	10,301.05
1	1	310-0016	LOGITEC SYSTEM MOUSE W/DISKS,FACT	EA	0.00	0.00
1	1	310-0310	DELUXE WINDOWS KEYBOARD,FACT	EA	0.00	0.00
1	1	310-3561	PWR SPLY,RDNT OPT/SHIP INFO,PE4400,FACT	EA	0.00	0.00
1	1	310-3563	USER+INSTL/TRBL GUIDE,PEDGE4400,FACT	EA	0.00	0.00
1	1	310-4020	RACK RAILS,INSIDE & OUT,PE4X00/6X00,FACT	EA	0.00	0.00
1	1	311-0748	2ND PROC,800MHZ/256K,P3,XEON,PE4400,FACT	EA	0.00	0.00
1	1	311-1225	512MB SDRAM,133MHZ,4X128MB DIMMS,P44,FAC	EA	0.00	0.00
1	1	313-7008	17/40X SCSI,CD-ROM,#1,BLACK,P43/63,FACT	EA	0.00	0.00
1	1	320-0058	NO MONITOR OPTION	EA	0.00	0.00
1	1	340-0608	1.44MB,3.5",FD,FOR DELL POWEREDGE,FACT	EA	0.00	0.00
1	1	340-1399	8-BAY HD CAGE,FRT,OPT,1",P43/63,FACT	EA	0.00	0.00
1	1	340-6660	4X18GB,10K,1.0 IN,U3,HD,PE4400	EA	0.00	0.00
1	1	340-6663	KIT,RAID ENABLER,PERC3-DI,128MB,P44,FACT	EA	0.00	0.00
1	1	340-7418	TB,20/40G,DAT,HH,CC,P4300,FACT	EA	0.00	0.00
1	1	340-7737	CONFIG#3,ROMB Q/NO DRIVES IN CAGE,FACT	EA	0.00	0.00
1	1	365-1234	READYWARE INSTALLATION FEE	EA	0.00	0.00
1	1	420-2833	VERITAS SERVER,PWRSTE	EA	0.00	0.00
1	1	430-0254	TWO INTEL PRO 100 PLUS NICs,PE,FACT	EA	0.00	0.00
1	1	430-5002	SW,NTS,NT4,ACAD,\$P6A,F5,FACT	EA	0.00	0.00
1	1	910-3540	NBD,SVR,INIT YR,UNIS (LA)(PE4XXX)	EA	0.00	0.00
1	1	910-3542	NBD,SVR,2YR EXT,UNIS (LA)(PE4XXX)	EA	0.00	0.00
1	1	361-2218	CFL,INFO,RAID5,SGL,CTN,FACT	EA	0.00	0.00
1	1	361-2935	DP,K-12CE,WNY 4.0,DFT,FACT	EA	483.95	483.95
1	1	361-3762	CFL,INFO,INSTL CUSTOM WNT,FACT	EA	0.00	0.00
1	1	362-0451	DP,SW,MS,EXCH/OTLK 2000,FACT	EA	599.00	599.00
1	1	365-0257	CFL,ROUTING SKU	EA	0.00	0.00
1	1	365-3035	DPW,INTG FEE,OR,K-12 BNDL,FACT	EA	99.00	99.00

PLEASE KEEP ORIGINAL BOX FOR ALL RETURNS.



DETACH AT PERF AND RETURN WITH PAYMENT

MAKE CHECK PAYABLE/REMIT TO:

Dell Marketing L.P.
c/o Dell USA L.P.
PO Box 534118

Atlanta, GA 30353-4118

Invoice Number: 395736689M
Customer Number: 10940620
Purchase Order: 471209820
Associated Order:

Ship. &/or Handling	\$	134.96
Subtotal	\$	11,815.96
Taxable:	Tax:	
\$	\$	0.00
ENVIRO FEE	\$	0.00
Invoice Total	\$	11,815.96

Ship. &/or Handling	\$	134.96
Subtotal	\$	11,815.96
Taxable:	Tax:	
\$	\$	0.00
ENVIRO FEE	\$	0.00
Invoice Total	\$	11,815.96
	\$	
	\$	
	\$	
Balance Due	\$	0.00
Amt. Enclosed	\$	

- Copy Only -



FID Number: 74-2616805
 Sales Rep: WENDI KOLETAR
 For Sales:
 Sales Fax:
 Customer Service:
 Technical Support:
 Dell Online: <http://www.dell.com>

This is your INVOICE
 -- Copy Only --

Customer Number: 10940620
 Purchase Order: 471209820
 Order Date: 6/27/2000

20 01 0 01 02 N

Page: 2 of 2

Invoice Number 395736689M

Invoice Date: 7/10/00
 Payment Terms: Net Due 30 Days
 Shipped Via:
 Waybill Number:

SOLD TO:

MCINTOSH MARY
 ST JOSEPH HIGH SCHOOL
 PLOT #3 MOUNT PLEASANT
 ROUTE 2 FREDERIKSTED
 ST CROIX, VI 00840-

SHIP TO:

LETANG CLAINA
 ST JOSEPH HIGH SCHOOL
 PLOT #3 MOUNT PLEASANT
 ROUTE 2 FREDERIKSTED
 SAINT CROIX, VI 00840-

Ordered	Shipped	Item Number	Description	Unit	Unit Price	Amount
1	1	365-4210	CFIW,INTG SVC,APPLICATIONS,SERV	EA	99.00	99.00
1	1	365-4210	CFIW,INTG SVC,APPLICATIONS,SERV	EA	99.00	99.00
1	1	370-1862	SINGLE TARY,ARON,TSR	EA	0.00	0.00
1	1	900-9997	ONSITE INSTL DECLINED(SVR)	EA	0.00	0.00



-- Copy Only --



This is your INVOICE
- Copy Only -

Page: 1 of 1

FID Number: 74-2616805
Sales Rep: WENDI KOLETAR
For Sales:
Sales Fax:
Customer Service:
Technical Support:
Dell Online: <http://www.dell.com>

Customer Number: 10940620
Purchase Order: 471209820
Order Date: 6/14/2000
20 01 0 01 02 N

Invoice Number 388957359M

Invoice Date: 6/16/00
Payment Terms: Net Due 30 Days
Shipped Via:
Waybill Number:

SOLD TO:

MCINTOSH MARY
ST JOSEPH HIGH SCHOOL
PLOT #3 MOUNT PLEASANT
ROUTE 2 FREDERIKSTED
ST CROIX, VI 00840-

SHIP TO:

LETANG CLAINA
ST JOSEPH HIGH SCHOOL
PLOT #3 MOUNT PLEASANT
ROUTE 2 FREDERIKSTED
SAINT CROIX, VI 00840-

Ordered	Shipped	Item Number	Description	Unit	Unit Price	Amount
1	1	220-0029	PEDGE4400,800MHZ/256K CACHE,P3 XEON,BASE	EA	10,552.42	10,552.42
1	1	310-0016	LOGITEC SYSTEM MOUSE W/DISKS,FACT	EA	0.00	0.00
1	1	310-0310	DELUXE WINDOWS KEYBOARD,FACT	EA	0.00	0.00
1	1	310-3561	PWR SPLY,RDNT OPT/SHIP INFO,PE4400,FACT	EA	0.00	0.00
1	1	310-3563	USER+INSTL/TRBL GUIDE,PEDGE4400,FACT	EA	0.00	0.00
1	1	310-4020	RACK RAILS,INSIDE & OUT,PE4X00/6X00,FACT	EA	0.00	0.00
1	1	311-0748	2ND PROC,900MHZ/256K,P3,XEON,PE4400,FACT	EA	0.00	0.00
1	1	311-1225	512MB SDRAM,133MHZ,4X128MB DIMMS,P44,FACT	EA	0.00	0.00
1	1	313-7008	17/40X SCSI,CD-ROM,#1,BLACK,P43/63,FACT	EA	0.00	0.00
1	1	320-0058	NO MONITOR OPTION	EA	0.00	0.00
1	1	340-0608	1.44MB,3.5",FD,FOR DELL POWEREDGE,FACT	EA	0.00	0.00
1	1	340-1399	3-BAY HD CAGE,FRT,OPT,1",P43/63,FACT	EA	0.00	0.00
1	1	340-6660	4X18GB,10K,1.0 IN,U3,HD,PE4400	EA	0.00	0.00
1	1	340-6663	KIT,RAID ENABLER,PERC3-DI,128MB,P44,FACT	EA	0.00	0.00
1	1	340-7419	TB,20/40G,DAT,HH,CC,P4300,FACT	EA	0.00	0.00
1	1	340-7739	CONFIG #5,ROMB 5/NO DRIVES IN CAGE,FACT	EA	0.00	0.00
1	1	365-1234	READYWARE INSTALLATION FEE	EA	0.00	0.00
1	1	420-2833	VERITAS SERVER,PWRSTE	EA	0.00	0.00
1	1	430-0254	TWO INTEL PRO 100 PLUS NICs,PE,FACT	EA	0.00	0.00
1	1	430-5002	SW,NTS,NT4,ACAD,SP6A,F5,FACT	EA	0.00	0.00
1	1	910-3540	NBD,SVR,INIT YR,UNIS (LA)(PE4XXX)	EA	0.00	0.00
1	1	910-3542	NBD,SVR,2YR EXT,UNIS (LA)(PE4XXX)	EA	0.00	0.00
1	1	370-1862	SINGLETARY,ARON,TSR	EA	0.00	0.00
1	1	900-9997	ONSITE INSTL DECLINED(SVR)	EA	0.00	0.00
2	2	340-1767	FORMATTED,MAGNETIC,TBU,DDS4,5PACK,CUST	EA	199.00	398.00

PLEASE KEEP ORIGINAL BOX FOR ALL RETURNS.



DETACH AT PERF AND RETURN WITH PAYMENT

Invoice Number: 388957359M
Customer Number: 10940620
Purchase Order: 471209820
Associated Order:

MAKE CHECK PAYABLE/REMIT TO:

Dell Marketing LP.
c/o Dell USA LP.
PO Box 534118
Atlanta, GA 30353-4118

Shlp. &/or Handling	\$	136.94
Subtotal	\$	11,087.36
Taxable:	Tax:	
\$	\$	0.00
ENVIRO FEE	\$	0.00
Invoice Total	\$	11,087.36

Shlp. &/or Handling	\$	136.94
Subtotal	\$	11,087.36
Taxable:	Tax:	
\$	\$	0.00
ENVIRO FEE	\$	0.00
Invoice Total	\$	11,087.36
	\$	
	\$	
	\$	
Balance Due	\$	0.00
Amt. Enclosed	\$	

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AUG. 9. 2006 4:25PM

DELL

NO. 032 P. 11



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Page: 1 of 1

FID Number: 74-2616805
Sales Rep: WENDI KOLETAR
For Sales:
Sales Fax:
Customer Service:
Technical Support:
Dell Online: <http://www.dell.com>

Customer Number: 10940620
Purchase Order: 471209820
Order Date: 6/14/2000
20 01 0 01 02 N

Invoice Number **388903759M**

Invoice Date: 6/29/00
Payment Terms: Net Due 30 Days
Shipped Via:
Waybill Number:

SOLD TO:

MCINTOSH MARY
ST JOSEPH HIGH SCHOOL
PLOT #3 MOUNT PLEASANT
ROUTE 2 FREDERIKSTED
ST CROIX, VI 00840-

SHIP TO:

LETANG CLAINA
ST JOSEPH HIGH SCHOOL
PLOT #3 MOUNT PLEASANT
ROUTE 2 FREDERIKSTED
SAINT CROIX, VI 00840-

Ordered	Shipped	Item Number	Description	Unit	Unit Price	Amount
2	2	790613	SUPERSTACK II SWITCH 3300 24 PORT 10/10	EA	1,608.95	3,617.90
7	7	128734	OFFICECONNECT 10/100 DUAL-SPEED SWITCH,	EA	194.95	1,364.65
8	8	129735	3COM OFFICE CONNECT 16 PORT 10	EA	347.95	2,783.60
15	15	519171	BACK-UPS 500	EA	148.95	2,234.25
2	2	129723	OFFICE CONNECT 4 PORT 100MB FAST ETHERNE	EA	92.95	185.90
6	6	485942	1000FT BULK CAT5E PVC PATCH	EA	95.95	575.70

PLEASE KEEP ORIGINAL BOX FOR ALL RETURNS.



DETACH AT PERF AND RETURN WITH PAYMENT

MAKE CHECK PAYABLE/REMIT TO:

Dell Marketing L.P.,
c/o Dell USA L.P.,
PO Box 534118

Atlanta, GA 30353-4118

Invoice Number: 388903759M
Customer Number: 10940620
Purchase Order: 471209820
Associated Order:

Ship. &/or Handling	\$	361.62
Subtotal	\$	11,123.62
Taxable:	Tax:	
\$	\$	0.00
ENVIRO FEE	\$	0.00
Invoice Total	\$	11,123.62

Ship. &/or Handling	\$	361.62
Subtotal	\$	11,123.62
Taxable:	Tax:	
\$	\$	0.00
ENVIRO FEE	\$	0.00
Invoice Total	\$	11,123.62
	\$	
	\$	
	\$	
Balance Due	\$	0.00
Amt. Enclosed	\$	

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Page: 1 of 1

FIO Number: 74-2616605
Sales Rep: WENDI KOLETAR
For Sales:
Sales Fax:
Customer Service:
Technical Support:
Dell Online: <http://www.dell.com>

Customer Number: 10940620
Purchase Order: 471209820
Order Date: 6/14/2000

20 05 0 01 02 N

Invoice Number **388907370M**

Invoice Date: 6/18/00
Payment Terms: Net Due 30 Days
Shipped Via:
Waybill Number:

SOLD TO:

MCINTOSH MARY
ST JOSEPH HIGH SCHOOL
PLOT #3 MOUNT PLEASANT
ROUTE 2 FREDERIKSTED
ST CROIX, VI 00840-

SHIP TO:

LETANG CLAINA
ST JOSEPH HIGH SCHOOL
PLOT #3 MOUNT PLEASANT
ROUTE 2 FREDERIKSTED
SAINT CROIX, VI 00840-

Ordered	Shipped	Item Number	Description	Unit	Unit Price	Amount
1	1	220-0605	POWEREDGE BASE RACK,BLACK,FACT	EA	5,435.00	5,435.00
1	1	310-0083	CBL,SWTCH BOX,MSE/KYBD/VIDEO,12',FACT	EA	0.00	0.00
1	1	310-0083	CBL,SWTCH BOX,MSE/KYBD/VIDEO,12',FACT	EA	0.00	0.00
1	1	310-0083	CBL,SWTCH BOX,MSE/KYBD/VIDEO,12',FACT	EA	0.00	0.00
1	1	310-0083	CBL,SWTCH BOX,MSE/KYBD/VIDEO,12',FACT	EA	0.00	0.00
1	1	310-0256	RACK MOUNT 2200 UPS,PEDGE,FACT	EA	0.00	0.00
1	1	310-0075	CRD,UPS,2-PORT,SNMP,PEDGE,FACT	EA	0.00	0.00
1	1	310-0578	RACK,SHELF,EQUIP,WEST,FACT	EA	0.00	0.00
1	1	310-0578	RACK,SHELF,EQUIP,WEST,FACT	EA	0.00	0.00
1	1	310-0202	DRAWER,RACKMOUNT KEYBOARD,FACT	EA	0.00	0.00
1	1	310-0190	MINI KEYBOARD WITH TRACKBALL,FACT	EA	0.00	0.00
1	1	310-0245	8 PORT KEYBD/MON SWITCHBOX,BLACK,PE,FACT	EA	0.00	0.00
1	1	310-0578	RACK,SHELF,EQUIP,WEST,FACT	EA	0.00	0.00
1	1	320-1502	M570,15 IN,13.8 IN VIS,PUTTY,MONITOR,PE	EA	0.00	0.00
1	1	310-0235	PANELS,RACK SIDE,BLACK,PEDGE,FACT	EA	0.00	0.00
1	1	310-0236	BRACES,SIDE,RACK STABILIZING,FACT	EA	0.00	0.00
1	1	460-0567	INFO,EXPEDITED DELIVERY,PEDGE RACK SYST	EA	0.00	0.00
1	1	310-3929	PDU,120V,LOW POWER,W/LOCK PLUG,RACK,FACT	EA	0.00	0.00
1	1	910-1450	O-S,RACK,INIT,(C)	EA	35.00	35.00
1	1	910-1452	O-S,RACK,YRS2&3,(C)	EA	246.00	246.00
1	1	900-9997	ONSITE INSTL DECLINED(SVR)	EA	0.00	0.00
1	1	370-1862	SINGLETARY,ARON,TSR	EA	0.00	0.00

PLEASE KEEP ORIGINAL BOX FOR ALL RETURNS.



DETACH AT PERF AND RETURN WITH PAYMENT

MAKE CHECK PAYABLE/REMIT TO:

Dell Marketing L.P.
c/o Dell USA L.P.
PO Box 534118

Atlanta, GA 30353-4118

Invoice Number: 388907370M
Customer Number: 10940620
Purchase Order: 471209820
Associated Order:

Ship. &/or Handling	\$	628.18
Subtotal	\$	6,346.18
Taxable:	Tax:	
\$	\$	0.00
ENVIRO FEE	\$	0.00
Invoice Total	\$	6,346.18

Ship. &/or Handling	\$	628.18
Subtotal	\$	6,346.18
Taxable:	Tax:	
\$	\$	0.00
ENVIRO FEE	\$	0.00
Invoice Total	\$	6,346.18
	\$	
	\$	
Balance Due	\$	0.00
Amt. Enclosed	\$	

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EXHIBIT C



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Acknowledgement Letter
Unappealable Issues

August 14, 2006

Tracey Feanny
Dell Computer Corporation
One Dell Way
Round Rock, TX 78682

Tracey Feanny,

The Schools and Libraries Division of the Universal Service Administrative Company has received your correspondence dated August 8, 2006, on August 10, 2006, regarding the FY2000 funding decision of your Form 471 Application Number(s).

Re:	Applicant Name:	St. Joseph High School
	Billed Entity Number:	209820
	Form 471 Application Number:	170343
	Funding Request Number(s):	365324
	Decision Letter:	Demand Payment Letter
	Original Decision Letter Date:	July 12, 2006

We have reviewed your correspondence carefully. Unfortunately the specific issues raised are not appealable under current program rules.

Please Note:

If there are other decisions related to this application that you wish to appeal, please follow the appeals procedure defined in the decision letter or refer to the Appeals Procedure on our website at <http://www.universalservice.org/sl/about/appeals/default.aspx>.

Schools and Libraries Division
Universal Service Administrative Company